

Robert A. Julian (SBN 88469)  
Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
1160 Battery Street, Suite 100  
San Francisco, CA 94111  
Telephone: 628.208.6434  
Facsimile: 310.820.8859  
Email: rjulian@bakerlaw.com  
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)  
Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Boulevard, Suite 1400  
Los Angeles, CA 90025  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: lattard@bakerlaw.com

*Counsel for Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors**

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF MICHAEL A.  
KELLY IN SUPPORT OF THE  
OPPOSITION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
TO THE DEBTORS' MOTION  
PURSUANT TO 11 U.S.C. §§ 105(a) AND  
502(c) FOR THE ESTABLISHMENT OF  
WILDFIRE CLAIMS ESTIMATION  
PROCEDURES [Dkt. No. 3091]**

Date: August 14, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

1 I, Michael A. Kelly, declare the following under penalty of perjury pursuant to 28 U.S.C.  
2 section 1746:

3 1. I submit this Amended Declaration in support of the Opposition of the Official  
4 Committee of Tort Claimants to the Debtors' motion to establish wildfire claims estimation  
5 procedures [Dkt. No. 3091]. I have personal knowledge of the facts set forth in this declaration.

6 2. I am a member of the State Bar of California and a partner in the law firm of Walkup,  
7 Melodia, Kelly & Schoenberger.

8 3. After the 2017 North Bay fires occurred, individual victims filed personal injury,  
9 wrongful death, and property damage civil actions for damages suffered in or by reason of the fires  
10 against Pacific Gas & Electric Company ("PG&E") in Sonoma and Napa Counties. The litigation  
11 was eventually coordinated in a Judicial Council Coordination Proceeding entitled California North  
12 Bay Fire Cases, JCCP No. 4955, in the Superior Court of California for the County of San  
13 Francisco.

14 4. The judge assigned to the California North Bay Fire Cases, Judge Curtis Karnow,  
15 entered Case Management Order No.1, dated March 6, 2018, attached hereto as **Exhibit A**, which  
16 appointed me and Frank Pitre as two of the three co-lead counsel in the litigation and an Executive  
17 Committee leadership team of lawyers representing the individual plaintiffs.

18 5. Attached hereto as **Exhibit B** is a true and correct copy of the Superior Court's Case  
19 Management Order No. 2 in the North Bay Fire Cases, JCCP 4955.

20 6. Attached hereto as **Exhibit C** is a true and correct copy of the Superior Court's Case  
21 Management Order No. 3 in the North Bay Fire Cases, JCCP 4955.

22 7. Attached hereto as **Exhibit D** is a true and correct copy of the Superior Court's Case  
23 Management Order No. 4 in the North Bay Fire Cases, JCCP 4955.

24 8. Attached hereto as **Exhibit E** is a true and correct copy of the Superior Court's Case  
25 Management Order No. 5 in the North Bay Fire Cases, JCCP 4955.

26 9. Attached hereto as **Exhibit F** is a true and correct copy of the Superior Court's Case  
27 Management Order No. 6 in the North Bay Fire Cases, JCCP 4955.

10. Attached hereto as **Exhibit G** is a true and correct copy of a Camp Fire complaint in *Williams v. PG&E*, Case No. 18CV03993 (Super. Ct. Cal.).

11. Attached hereto as **Exhibit H** is a true and correct copy of a letter, dated August 1, 2019, from Kevin Orsini, counsel to the Debtors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 6, 2019.



---

Michael A. Kelly  
Walkup, Melodia, Kelly & Schoenberger  
650 California Street, 26th Floor  
San Francisco, CA 94108  
Tel: (415) 981-7210  
Fax: (415) 391-6965  
Email: mkelly@walkuplawoffice.com